

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA <i>Plaintiff,</i>	§ § § §	
v.	§ § § §	CIVIL ACTION NO. 4:24-cv-796
PRCHOU, LLC; MUKADAS D. KURBAN; APAR PATAER; ABDUL R. DAWOOD; and MARIA E. DAWOOD <i>Defendants.</i>	§ § § § §	

**DEFENDANTS' UNOPPOSED VERIFIED
MOTION FOR ENLARGEMENT AND/OR EXTENSION OF TIME**

Defendants file this Unopposed Verified Motion for Enlargement and/or Extension of Time, requesting a 14 day extension of the deadline to respond to Plaintiff's Motion to Strike the Affirmative Defenses Pursuant to Rule 12(f) and Brief in Support (or "Motion to Strike").

I.

Hurricane Beryl has affected numerous residents of Houston and Fort Bend Counties¹ including the undersigned counsel for Defendants,² Minh-Tam "Tammy" Tran (or "Tran"). Ms. Tran fell ill in the aftermath of the storm and has been working diligently to catch-up following her illness and the extensive period without power and internet

¹ <https://apnews.com/article/hurricane-beryl-texas-7dfd5353671ee30d0c6d11518ea5a370>

² Minh-Tam Tran represents main Defendants PRCHOU, LLC, Mukadas D. Kurban and Apar Pataer.

services following the storm. In furtherance of these efforts, Defendants respectfully request a 14 day extension of the deadline to respond to Plaintiff's Motion to Strike.

II.

The extension would provide the time needed for the Defendants and their counsel to prepare and file the appropriate response to Plaintiff's Motion to Strike. The proposed new deadline is September 13, 2024. This request is not made for purposes of delay but so that substantial justice may be done.

III.

All Defendants join in this request. Finally, counsel for Plaintiff was consulted about the relief requested herein and said opposing counsel promptly and graciously indicated that Plaintiff is unopposed.

For the reasons stated above, Defendants respectfully request that the Court extend the deadline for Defendants to respond to Plaintiff's Motion to Strike Affirmative Defenses to September 13, 2024. Defendants also request all other relief to which they are justly entitled.

Respectfully Submitted,

The Tammy Tran Law Firm

/s/ *Minh-Tam Tran*

Minh-Tam (Tammy) Tran
Texas Bar No. 20186400
4900 Fournace Place, Suite 418
Bellaire, Texas 77401
Telephone: (832) 372-4403
Email: ttran@tt-lawfirm.com

**Attorneys Defendants
PRCHOU, LLC,
Mukadas D. Kurban, and
APAR PATAER**

Meade Neese & Barr LLP

/s/ D. John Neese, Jr.
D. John Neese, Jr.
State Bar No. 24002678
Samuel B. Haren
State Bar No. 24059899
2118 Smith Street
Houston, Texas 77002
(713) 355-1200
jneese@mnblp.com
sharen@mnblp.com

**Attorneys for Defendants
Abdul R. Dawood and
Maria E. Dawood**

Certificate of Conference

Counsel for Plaintiff indicated that he is opposed to the relief requested herein.

/s/ Minh-Tam Tran
Minh-Tam (Tammy) Tran

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by electronic service on August 30, 2024.

/s/ Minh-Tam Tran
Minh-Tam (Tammy) Tran

VERIFICATION

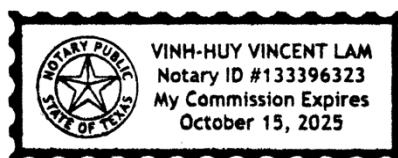
STATE OF TEXAS §
COUNTY OF HARRIS §

Before me, a notary public, on this day, personally appeared **MINH-TAM TRAN**, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct and within personal knowledge.



MINH-TAM TRAN

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, on August 27, 2024, to certify which witness my hand and seal of office.



Vinh-Huy Vincent Lam
NOTARY PUBLIC IN AND
FOR THE STATE OF TEXAS